

Exhibit 23

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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NATASHA SEVERIN and GALINA
COTOVA, individually and on Behalf of
all others similarly situated,

No. 10 Civ. 9696(DLC)

Plaintiffs,

- against -

DECLARATION

PROJECT OHR, INC., METROPOLITAN
COUNCIL ON JEWISH POVERTY, and
D'VORAH KOHN,

Defendants.
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I, Blossom King, pursuant to 28 U.S.C. §1746, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct:

1. I am employed by Project OHR, Inc. (Project OHR) as a home attendant and the declarations I make below are true and correct to the best of my knowledge, information and belief.

2. For the last 25 years I have worked at Project OHR as a Home Attendant caring for many of its clients. I am generally familiar with the types of shifts available to work and how Project OHR staffs these shifts. I have worked sleep-in, split, and hourly shifts regularly over the years. Regardless of the type of shifts I work each week, my main goal is always to care for the well-being of the client.

3. How I reach that goal depends on the client I am caring for. They all suffer from different conditions, and have different capabilities and needs. They all live in different types of homes and may or may not have other family members to help care for them too. What they need done for them differs from day to day. For example, right

now I am caring for a very difficult client. She can't do anything for herself. I have to spend my shift preparing her meals and feeding them to her, and cleaning up after her, whether it is washing the dishes and wiping down the table. I have to dress and undress her, which because of her condition takes a long time. I have to reposition her and help her take her medications. If she needs a shower I have to give it to her, and of course I'll clean up the bathroom afterwards since a lot of water gets on the floor. The last thing you want is for your client to have an accident. I have to take care of all of her hygiene needs like assisting with dentures, brushing her hair and similar things. I have to clean the bathroom sink and surrounding countertop after doing that. I am always changing her adult diapers, and, unfortunately, her sheets, because she soils them constantly. I also have to mop or clean the areas where she soils the floor because she does this as well. Of course, I will wash her sheets and clothes. I also take her out of the apartment to get some fresh air. I try to take her to different places outside. I also sit with her for long periods of time. I will watch TV with her or just talk to her so she can hear someone's voice.

4. Other clients may not be as difficult to care for. They can do things like feed themselves and use the bathroom, although with my assistance. It really depends on the client and whether they are having a good day or a bad day, both in terms of their emotions and their physical strength. But at all times, I am there to care for them and these activities are what I spend just about my entire shift doing.

5. Sometimes, I have to do what the home attendants call light cleaning. The plan of care tells us what type of light cleaning to do, which is usually on a weekly basis. We are taught about light cleaning at our mandatory training sessions, which we must

attend twice a year. I will usually do some light dusting and sweeping, or mop when necessary. If I share a client with another home attendant, and she has already done this work, I will not do it that week. It doesn't take me very long – maybe around 30 minutes since these are usually very small apartments. It takes even less time when I am caring for a client that is more or less bed-ridden since they really don't use their apartments. We do this cleaning to keep the client in a safe and clean home. I cannot have one of my clients slipping on a wet or dirty floor, especially in the bathroom or kitchen.

6. Although less so in the past few years, my clients have occasionally asked me to do what's called heavy cleaning – stand on ladders or stools and wipe or pull curtains, clean furniture, vacuum underneath or behind furniture, things of that nature. I always told them that I was not permitted to do this type of work and I would not do this type of work. In fact, one of my current clients actually hired a housekeeper to do this cleaning because I refused to do it. One of my other clients always has family members coming around the house and they never ask me to perform any heavy cleaning or to do any chore for them. Our supervisors constantly remind us that this type of work is not permitted. They also tell us this at training sessions. My supervisor will also call the client if necessary and remind them that heavy cleaning is not permitted. The requests usually stop after that.

Dated: November 22, 2011
New York, New York

By: Blossom R. King
Blossom King